

3-14-84

DECLARATION OF GERALD ARMSTRONG

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2 1. I am the defendant in the case of Church of  
3 Scientology of California v. Armstrong, Case No. 420153.

4 2. This declaration is made in support of a motion  
5 to compel plaintiff to produce documents known as the "MCCS  
6 files."

7 3. MCCS refers to "Mission Corporate Category  
8 Sort-out." The purpose of this mission was to work out and  
9 implement strategies by which L. Ron Hubbard could retain  
10 control of Scientology while remaining "at arm's length" and  
11 being insulated from individuals seeking redress of wrongs.

12 4. The MCCS files contain correspondence from  
13 L. Ron Hubbard to various people in Scientology organizations,  
14 correspondence between MCCS personnel, specifically Laurel  
15 Sullivan, Richard Sullivan, Lisa Britowich, Rick Klinger,  
16 Barbara De Celle and Gerald Armstrong to Mary Sue Hubbard  
17 and David Miscavige, both of whom had supervisory roles relating  
18 to MCCS. A very few of the MCCS materials are materials between  
19 Laurel Sullivan and Alan Wertheimer, attorney for L. Ron Hubbard.

20 5. Contained in the MCCS files are documents which  
21 show that Mary Sue Hubbard was completely aware that the Hubbard  
22 archives were being made available to Omar Garrison in connection  
23 with a biography being done of L. Ron Hubbard, and that these  
24 biographical archives were known to be in my possession.

25 6. Also contained in the MCCS files are documents  
26 which show that I was to be paid by Mr. Hubbard for my work  
27 on the biography project.

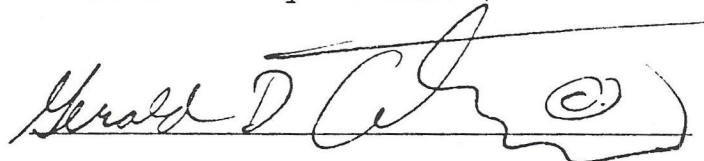
28 7. Also contained in the MCCS files is a great

1 deal of documentation concerning the Hubbard Archives, their  
2 ownership and possessary rights.

3 8. I understand that plaintiff has claimed that  
4 the MCCS files are protected by the attorney-client privilege.  
5 Very few of the MCCS documents went to an attorney, and if  
6 they did go to an attorney, they went to Alan Wertheimer,  
7 L. Ron Hubbard's attorney and would be so noted.

8 9. The MCCS files are essential to my defense  
9 because they show that I had legal and authorized possession  
10 of the Hubbard Archives, that I delivered these materials  
11 to Omar Garrison pursuant to agreement, and that I was to  
12 be paid by Mr. Hubbard, as I was part of his personal staff.

13 I declare under penalty of perjury that the foregoing  
14 is true and correct. Executed this 14th day of March, 1984.

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17 GERALD D. ARMSTRONG  
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